

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>  <b>Marla Dena Lee</b> <b>Debtor,</b>	<b>§</b> <b>§</b> <b>§</b> <b>§</b>	<b>Case No. 16-42312-mxm13</b> <b>Chapter 13</b>
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**RESPONSE(OPPOSITION) OR NON-OPPOSITION) OF BSI FINANCIAL SERVICES  
AS MORTGAGE SERVICER FOR U.S. BANK TRUST N.A. AS TRUSTEE OF  
BUNGALOW SERIES F TRUST TO TRUSTEE'S NOTICE OF AMOUNT DEEMED  
NECESSARY TO CURE MORTGAGE ARREARS [Doc. #63]**

COMES NOW, BSI Financial Services ("BSI Financial") as Mortgage Servicer for U.S. Bank Trust N.A., as Trustee of Bungalow Series F Trust ("Creditor"), who, for its Response to the Trustee's Notice of Amount Deemed Necessary to Cure Mortgage Arrears Mid Case][Doc. # 63], would show the Court as follows:

1. Creditor **agrees** with the Trustee's Notice as to Court Claim #4, Trustee Claim #1 and that the principal amount necessary to cure the pre-petition mortgage arrearage claim to be paid by the Trustee is \$0.00 as of the Date of the Trustee's Notice, having paid \$1,000.00 on said claim as of the date of Trustee's Notice.
2. As to Court Claim #4, Trustee Claim #2, Creditor states that the Debtor **is not** current on all post petition payments consistent with 11 U.S.C. § 1322(b)(5) of the Bankruptcy code, including all fees, charges, expenses, escrow, and costs. Creditor asserts that the total amount remaining unpaid as of May 4, 2018 is:
  - a. Total postpetition on going payment due: \$44,065.93
  - b. Total fees, charges, expenses, escrow, costs outstanding: \$0.00
  - c. Total amounts due postpetition.: \$44,065.93

Creditor asserts that the Debtor is contractually obligated for Postpetition payments that first became due on July 1, 2016. Attached as Exhibit A is an itemized payment history disclosing all payments received, all fees, costs, escrow, and expenses assessed to the mortgage and all amounts the creditor contends remain unpaid from the date of the bankruptcy filing through the date of this response.

Respectfully submitted,

/S/RICHARD E. ANDERSON

Richard E. Anderson  
State Bar No. 01209010  
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Attorney for Creditor

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the RESPONSE OF CREDITOR IN RESPONSE TO TRUSTEE'S NOTICE OF AMOUNT DEEMED NECESSARY TO CURE MORTGAGE ARREARS was served on the 25th day of May, 2018. Said Response was filed electronically. Service was accomplished by the method and to the following as indicated.

/S/RICHARD E. ANDERSON  
Richard E. Anderson

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

**Debtor**

Marla Dena Lee  
1941 Forest Park Blvd (Property)  
Fort Worth, TX 76110

**Debtor**

Marla Dena Lee  
1941 Forest Park Blvd (Mailing)  
Fort Worth, Texas 76110

**Debtor's Attorney**

Wally Woodrow Wadsworth  
Wadsworth Law Firm  
606 W. Wheatland Rd., Suite 107  
Duncanville, Texas 75116  
[law@wallywadsworth.com](mailto:law@wallywadsworth.com)

**Trustee**

Tim Truman  
6851 N.E. Loop 820, Suite 300  
N. Richland Hills, TX 76180

**US Trustee**

U.S. Trustee  
1100 Commerce Street Room 976  
Dallas, Texas 75242

CREDITOR ATTORNEY

**Kristen Leigh Baker**

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333 Clay Drive, 29th Floor  
Houston, TX 77002  
(713) 328-2881  
(713) 351-0381 (fax)  
kb@hwa.com

*Assigned: 08/17/2016*

representing **Select Portfolio Servicing, Inc**  
*(Creditor)*

**Melissa Linell Palo**

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*Assigned: 06/21/2016*

**Tarrant County**  
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*(Creditor)*

**Yoshie Valadez**

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*Assigned: 08/15/2016*

representing **Seterus Inc.**  
PO BOX 1047  
Hartford, CT 06143  
*(Creditor)*

**Michael L. Weems**

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713 759-6834 (fax)  
mlw@hwa.com

*Assigned: 11/21/2016*

representing **Select Portfolio Servicing, Inc**  
*(Creditor)*

/s/ Richard E. Anderson  
RICHARD E. ANDERSON





Payment Changes					
Date	P&I	Escrow	Total	Notice Filed	
7/1/2016	\$1,047.85	\$868.06	\$1,915.91	Filed w/ POC	
		\$0.00		NPGC	
		\$0.00			
		\$0.00			
		\$0.00			
		\$0.00			

Loan Information	
Loan #	
Borrower	Lee
BK Case #	16-42312
Date Filed	6/11/2016
First Post Petition Due Date	7/1/2016
POC Covers	3/1/15-6/1/16
	POC filed by DA

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